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SHAC MT, LLC, David Michael Talla, and Peter Feinstein*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CORISSA JONES, on behalf of herself and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SHAC, LLC D/B/A SHAPPHIRE [*sic*]
GENTLEMEN'S CLUB; SHAC MT, LLC;
DAVID MICHAEL TALLA and PETER
FEINSTEIN,

Defendants.

SHAC, LLC,

Counterclaimant,

CORISSA JONES, and all others similarly
situated who opt into this litigation,

Counterdefendants.

Case No. 2:15-cv-01382-RFB-CWH

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEADLINE
TO OPPOSE MOTION FOR SUMMARY
JUDGMENT on LIABILITY [DOC 189]**

(Fourth Request)

**AND JOINT REQUEST FOR
EXTENSION OF PAGE LIMITS FOR
OPPOSITION AND REPLY**

1 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs/Counter-
2 Defendants, including Corissa Jones and all Plaintiffs who opted into the instant action (“Class
3 Plaintiffs”), by and through their counsel of record, the law firm of Kennedy Hodges LLP, and
4 Defendants/Counter-claimants SHAC, LLC, SHAC, MT, LLC, David Michael Talla and Peter
5 Feinstein (“SHAC”), by and through their counsel of record, the law firm of Greenberg Traurig, LLP,
6 as follows:

- 7 1. On February 4, 2019, Plaintiffs filed three voluminous partial motions for summary
8 judgment, Docs. 189, 190 and 191;
- 9 2. The deadline for Defendants to respond was extended to March 7, 2019 (ECF 198), and
10 thereafter to March 14, 2019 (ECF 201), and thereafter to March 19, 2019.
- 11 3. Defendants have filed their oppositions to the Motions in Doc 190 and 191.
- 12 4. However, Defendants requested, and Plaintiffs agreed to an additional extension of time
13 for the opposition to the Motion for Summary Judgment on Liability.
- 14 5. This Motion included as exhibits multiple references to the depositions of nine
15 Representative Plaintiffs, as well as to Declarations from 47 additional Opt-In Plaintiffs.
- 16 6. Preparation of the Opposition is requiring review of voluminous records relating to these
17 56 Plaintiffs.
- 18 7. Accordingly, the parties stipulate that Defendants will file their opposition to the pending
19 Motion for Summary Judgment on Liability, Doc. 189, by or before April 2, 2019.

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8. Additionally, because of the need to analyze and discuss evidence related to 56 Plaintiffs, the parties stipulate, subject to this Court's approval pursuant to LR II-7-3, to an increase by five pages in the maximum number of pages permitted in both the Opposition and Reply.

IT IS SO STIPULATED.

DATED this 19th day of March, 2019

DATED this 19th day of March, 2019.

GREENBERG TRAURIG, LLP

KENNEDY HODGES LLP


By: /s/ Alayne Opie

By: /s/ Carl Fitz

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IT IS SO ORDERED this 21st day of March, 2019.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE